

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

IN RE:

ELOGENE HUGHES,

DEBTOR.

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CASE NO. 14-04387-TOM13

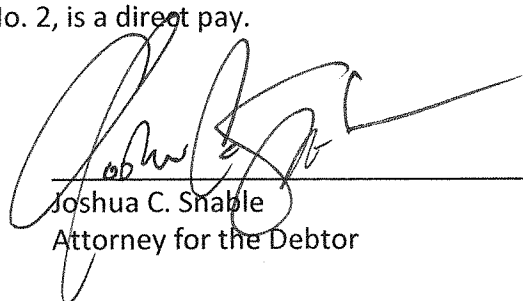
CHAPTER 13

MOTION TO MODIFY

Comes now, Elogene Hughes, by and through her attorney, Joshua C. Snable, and respectfully requests this Honorable Court to modify her confirmed plan as follows:

1. That this plan was confirmed on or about February 3, 2015.
2. That Debtor's plan failed to list a debt owed to Citimortgage, Inc. (Claim No. 2). That Debtor has filed an objection to said claim and same is pending before this Court.
3. Debtor was unaware that she still owed this debt. This debt is a note secured by a mortgage on a home owned by Debtor's ex-husband. Debtor was simply on the note, and not on said mortgage. Debtor had no reason to believe that she still owed this debt, as it is a debt being paid by her ex-husband.
4. That upon further investigation, Debtor is still obligated on this note, and thus Claim No. 2 is a valid debt. However, Debtor requests that this debt be treated as a "direct pay" for purposes of this plan.

WHEREFORE, PREMISES CONSIDERED, Debtor requests this Honorable Court to modify this plan to show that CitiMortgage, Inc., Claim No. 2, is a direct pay.



Joshua C. Snable
Attorney for the Debtor

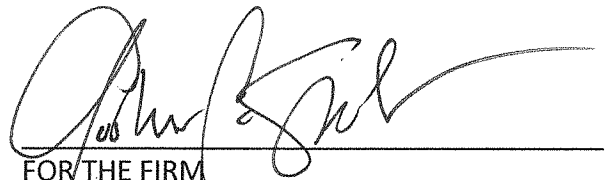
FOR THE FIRM:

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served on the Honorable D. Sims Crawford, Chapter 13 Trustee, at P.O. Drawer 10848, Birmingham, Alabama, 35202 and on all creditors listed on the matrix by placing a copy of same in the U.S. Mail, properly addressed and first class postage prepaid, this 1st day of June, 2015.



FOR THE FIRM